

OPEN MEETING AGENDA ITEM



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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

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AZ CORP COMMISSION
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GARY PIERCE – CHAIRMAN
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PAUL NEWMAN
BRENDA BURNS

IN THE MATTER OF THE APPLICATION OF
SOUTHWEST GAS CORPORATION FOR THE
ESTABLISHMENT OF JUST AND REASONABLE
RATES AND CHARGES DESIGNED TO
REALIZE A REASONABLE RATE OF RETURN
ON THE FAIR VALUE OF ITS PROPERTIES
THROUGHOUT ARIZONA.

Docket No. G-01551A-10-0458

**NATURAL RESOURCES DEFENSE
COUNCIL'S COMMENTS ON
STAFF'S PROPOSED ORDER**

The Natural Resources Defense Council ("NRDC") submits the following comments on
Commission Staff's transmittal memorandum and proposed order regarding the Southwest Gas
Corporation Modified Energy Efficiency and Renewable Energy Technology Plan ("Modified Plan").

The proposed annual energy savings set forth in the Modified Plan and Recommended Order
should be increased by at least 75,000 therms, consistent with the calculations and comments of the
Southwest Energy Efficiency Project ("SWEET"), which NRDC supports. Section 5.8 of the
Settlement Agreement requires that the approved Modified Plan achieve at least 1,250,000 therms of
annual energy savings from energy efficiency within nine months of Commission approval:

"This modified EE and RET Plan shall result in an incremental improvement of EE
that exceeds the current Southwest Gas approved portfolio budget of \$4.4 million, and that
results in customer annual energy savings of at least 1,250,000 therms within nine months
of Commission approval of the modified Plan." (Section 5.8, Settlement at p. 17).

An additional 75,000 therms of annual energy savings from energy efficiency are required to
meet the minimum terms of the Settlement Agreement.

Arizona Corporation Commission
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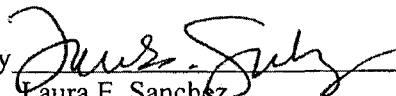
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1 NRDC supports achieving the increased energy savings in the Smarter, Greener, Better
2 Custom Business Rebates Program in order to meet the total energy savings required by the
3 Settlement Agreement.

4 Thank you for the opportunity to submit these comments on the Modified Plan.
5

6
7 RESPECTFULLY SUBMITTED this 1st day of November, 2011.

8 NATURAL RESOURCES DEFENSE COUNCIL

9
10 By: 
11 Laura E. Sanchez
12 **Note New Mailing Address:**
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14 (505) 352-7408 | lsanchez@nrdc.org
15 Attorney for NRDC

16 ORIGINAL and 13 COPIES of the
17 foregoing filed this 1st day of
18 November, 2011 to:

19 Docketing Supervisor
20 Docket Control
21 Arizona Corporation Commission
22 1200 W. Washington
23 Phoenix, AZ 85007

24 By: 

25 COPIES of the foregoing
26 electronically mailed this
27 1st day of November, 2011 to:

28 All Parties of Record

By: 